

JUDGE KATHLEEN CARDONE

IN THE UNITED STATES DISTRICT COURT FILED

FOR THE WESTERN DISTRICT OF TEXAS 2009 JUN 10 PM 3:13

EL PASO DIVISION

CLERK, US DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY Fm
DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

vs.

EMIR JAMAL DANIELS,

Defendant

) **NO. EP-09-CR-_____**

) **INDICTMENT**

) **(Vio: Ct 1: 18:2423(a) – Transportation of**
) **minor with intent to engage in**
) **criminal sexual activity**

) **Ct 2: 18:2423(b) - Travel with intent**
) **to engage in illicit sexual**
) **conduct**

) **Ct 3: 18:2422(a) - Coercion and**
) **enticement**

) **Ct 4: 18:2251(a) and (e) - Production**
) **of Material Involving the Sexual**
) **Exploitation of Children,**

) **Ct 5: 18:2252(a)(2) and (b)(1) -**
) **Receipt of Material Involving**
) **the Sexual Exploitation of**
) **Children**

THE GRAND JURY CHARGES:

EP09CR1709

FIRST COUNT

(18 U.S.C. §2423(a) - Transportation of Minor/Sexual Activity)

On or about April 23, 2009, in the Western District of Texas and elsewhere, the
defendant,

EMIR JAMAL DANIELS,

did knowingly transport an individual who had not attained the age of 18 years, to wit: "AC"
in interstate commerce, that is from the State of Texas to the State of Illinois, and points
in between, with the intent that such individual engage in sexual activity for which any

person can be charged with a criminal offense in violation of Title 18, United States Code, Section 2423(a).

SECOND COUNT

(18 U.S.C. § 2423(b) - Travel With Intent To Engage In Illicit Sexual Activity)

On or about April 23, 2009, in the Western District of Texas and elsewhere, the defendant,

EMIR JAMAL DANIELS,

a citizen of the United States, did knowingly travel in interstate commerce, that is from the State of Illinois to the State of Texas then back to the State of Illinois, for the purpose of engaging in illicit sexual conduct with another person, all in violation of Title 18, United States Code, Sections 2423(b).

THIRD COUNT

(18 U.S.C. §2422 - Coercion and Enticement)

On or about April 23, 2009, in the Western District of Texas and elsewhere, the defendant,

EMIR JAMAL DANIELS

did knowingly persuade, induce, and entice and attempt to persuade, induce and entice, an individual, to wit: AC, to travel in interstate commerce to engage in sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18 United States Code Section 2422(a).

COUNT FOUR

(18 U.S.C.2251(a) and (e))

Beginning on or about July 28, 2008 and continuing to on or about April 23, 2009,

in the Western District of Texas, and elsewhere, the defendant,

EMIR JAMAL DANIELS,

did knowingly attempt to employ, use, persuade, induce, entice, and coerce a person under the age of eighteen, to-wit: AC, a natural person, with the intent the minor engage in sexually explicit conduct, specifically, the lascivious exhibition of the genitals and pubic area of said person for the purpose of producing visual depictions of such conduct, specifically photographs and videos, and the defendant knew and had reason to know that said visual depictions would be transported and transmitted in interstate commerce, and that said visual depictions were produced and would be produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT FIVE
(18 U.S.C. § 2252(a)(2) and (b)(1))

Beginning on or about July 28, 2008 and continuing to on or about January 25, 2009, in the Western District of Texas, and elsewhere, the defendant,

EMIR JAMAL DANIELS,

did knowingly receive visual depictions, of a person under the age of eighteen (18), engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), to-wit, the graphic and lascivious exhibition of the genitals and the pubic area of said person under the age of eighteen (18), the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct, and which visual depictions had been transported in interstate and foreign commerce, by computer, in

violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

JOHN E. MURPHY
ACTING UNITED STATES ATTORNEY

BY: 

Assistant United States Attorney